

V. ALTERNATIVES

The *CEQA Guidelines* require analysis of a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the project's basic objectives and avoid or substantially lessen any of the significant effects of the project. The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.¹ The *CEQA Guidelines* also require that the Lead Agency evaluate the comparative merits of the alternatives, and identify the Environmentally Superior Alternative from among those considered. The following discussion is intended to inform the public and decision makers of potentially feasible alternatives to the proposed North Park Street Code.

This chapter analyzes two alternatives to the North Park Street Code:

- A "No Project" alternative in which the City of Alameda does not adopt the new code. Development in the area would occur as permitted under the existing zoning designations and policies in the Alameda General Plan.
- An "Environmentally Superior" alternative in which the City of Alameda adopts a modified North Park Street Code that has been changed to reduce the environmental impacts identified in this EIR associated with the North Park Street Code.

ANALYSIS OF NO PROJECT ALTERNATIVE

Description:

The No Project alternative assumes that the North Park Street Code is not adopted and that existing zoning designations stay in place. Development in the North Park Street area would occur as allowed by the existing *General Plan* and the existing zoning districts which are currently in place in the area. The existing zoning is described in Chapter 4 -A Land Use.

Feasibility:

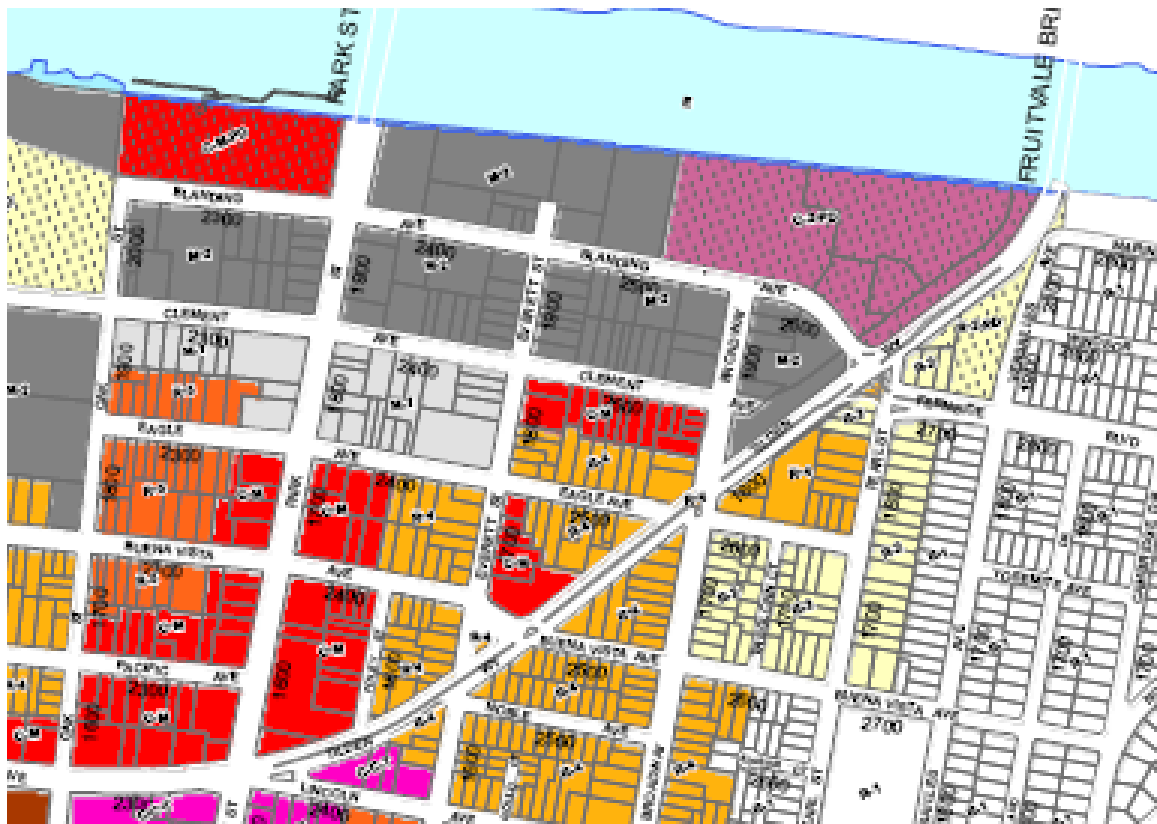
The No Project Alternative is a feasible alternative. To accomplish this alternative, the City of Alameda Planning Board and City Council would simply not take action to adopt the Park Street Code. Future development would continue in the area as permitted by the existing zoning and existing General Plan.

¹ *CEQA Guidelines*, 1998, Section 15126.6.

The major differences between the type and intensity of development that would occur under this alternative as compared to the North Park Street Code would include the following:

- The existing CM (Commercial Manufacturing), M-1 (Intermediate Industrial) and M-2 (General Industrial) zoning districts allow by right a wide variety of uses including but not limited to: auto repair, canneries, battery manufacturing, machine shops, plastic, rubber, and synthetic rubber manufacturing, truck repair and overhauling, freighting and motor truck terminals, heavy equipment storage yards, die casting, enameling works, foundries, and “poultry and rabbit killing and dressing”. None of these types of uses are permitted by right by the North Park Street Code.

Existing Zoning Map



- Many existing residential properties are currently zoned for manufacturing use (M-2 Zoning). As legal non-conforming uses, these homes may remain but cannot be expanded or replaced if destroyed by fire or other natural disaster, pursuant to the existing zoning. The North Park Street code rezones these properties such that they would no longer be non-conforming uses under the Alameda Municipal Code.
- The existing zoning allows much taller buildings. Much of the North Park Street area is currently zoned CM Commercial Manufacturing or M-2 Manufacturing. The height limits in these districts is 100 feet. The height limit in the North Park Street Code is 50 feet on Park Street and 30 feet in the neighborhood areas.

- The existing zoning does not include the design standards for new development that are included in the “form-based” North Park Street Code. The existing zoning relies on the Design Review Ordinance for control over design. Currently the City of Alameda has design guidelines for residential development, but very few guidelines or requirements for non-residential development.

Ability to Meet Project Objectives:

The No Project Alternative would not meet many of the Project Objectives described in Chapter 2 Project Description. The objectives are listed below:

- To update the zoning code for the plan area to conform with General Plan objectives, goals, and policies.

Maintaining the existing zoning for the area would not achieve this objective. Under the No Project Alternative the zoning code would not be updated and conflicts between the existing zoning and General Plan would remain.

- Adopt Zoning Ordinance amendments, standards and requirements to guide future development consistent with the community’s vision as articulated by the General Plan and Gateway Strategic Plan.

Maintaining the existing zoning for the area would not achieve this objective. Under the No Project Alternative the zoning code would not be updated to implement the General Plan and Gateway Strategic Plan.

- Manage the redevelopment of private sites to create an active, pedestrian-friendly, transit-oriented mixed-use environment.

This objective would not be fully realized under the No Project Alternative. The existing zoning does not include the clear and specific requirements that are included in the North Park Street code to ensure that new developments support an active, pedestrian friendly, mixed use transit oriented environment.

- Provide certainty for the community, property owners and future investors in the area by providing clear, form based regulations for the plan area.

This objective would not be achieved as well as under the North Park Street Code due to the conflicts between the existing zoning in the area and the General Plan and Gateway Plan community goals and objectives for the area. The differences between the older zoning and the newer policy documents results in confusion regarding the City’s requirements and standards for new development.

- Encourage economically viable redevelopment that is sensitive to existing neighborhoods and the historic character of the area.

This objective would not be achieved as well under the No Project Alternative. The existing zoning allows a number of uses and development types that are not sensitive to existing neighborhoods or the historic character of the area.

Ability to Reduce Environmental Impacts

Less Than Significant Impacts:

As described in Chapter 4, the North Park Street Code would not result in any significant impacts in the following environmental areas:

- Land use
- Population, employment, and housing
- Municipal Services and Open Space

The No Project alternative would have similar less than significant impacts. Since actions to approve or disapprove projects under the existing zoning standards would continue to be governed by the General Plan and the other provisions of the Alameda Municipal Codes, such as the Citywide Development Impact Fee ordinance, there is no basis to expect that land use; population, employment or housing; or municipal service impacts would be less or more severe than under the North Park Street Code.

Significant Impacts Requiring Mitigation: As described in Chapter 4, the North Park Street Code does require mitigation to maintain a less than significant impact in the areas of:

- Utilities,
- Biology,
- Cultural Resources,
- Noise,
- Geology,
- Hydrology, and
- Hazardous materials.

The potential for impacts in these environmental areas would also occur with the No Project Alternative. The type and intensity of potential developments that might occur under the existing zoning, and the physical form that the development might exhibit, may in fact, result in more significant impacts in these areas. Under the existing zoning and design review ordinances, the City, in most cases, will have the ability to subject most new developments to environmental review, which would provide the opportunity to impose mitigation measures on new development that might occur under the existing zoning. Assuming that the City could impose similar mitigations, then it may be assumed that the impact in these environmental areas would be no worse or better under the No Project Alternative. However, there may be some circumstances where a new use that is permitted under the existing zoning (such as truck repair and overhauling, freighting and motor truck terminals, heavy equipment storage yards, die casting, enameling works, foundries, and “poultry and rabbit killing and dressing”) might occur in an existing

building. If the use does not require a discretionary use permit or a discretionary design review permit, the City would not have the ability to impose mitigation measures to protect these environmental areas. In these cases, the impacts under the No Project Alternative could be more severe than under the North Park Street Code.

Significant Unavoidable Impacts: As described in Chapter 4, the North Park Street Code does result in significant, unavoidable impacts even with mitigation in the following areas:

- Transportation and Circulation, and
- Greenhouse Gas and Air Quality.

The North Park Street Code standards and requirements and additional mitigation imposed on future development by adoption of the recommended Mitigation Measures in this EIR are designed to reduce greenhouse gas, air quality, and traffic impacts to less than that which would occur under a continuation of development under the existing zoning ordinance.

The No Project Alternative could be expected to result in the same or more significant impacts in these areas, largely due to the fact that the amount of development anticipated under the No Project Alternative is not less than under the North Park Street Code. As with the other environmental areas, new development that is subject to environmental review could be mitigated to reduce these impacts under the No Project Alternative. In these cases the severity of the impacts in the area of traffic, greenhouse gas and air quality could be expected to be similar. However, in cases where a new use might occur without requiring discretionary review and approval, the City would not have the ability to impose mitigations to reduce the severity of the impact. In these cases, the impacts under the No Project alternative could be more severe.

ANALYSIS OF ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Description:

For the purposes of this analysis, an “environmentally superior” alternative considers an alternative that includes potential changes to the North Park Street Code to reduce or eliminate environmental impacts associated with the North Park Street Code.

Feasibility:

The Environmentally Superior Alternative is a feasible alternative. To accomplish this alternative, the City of Alameda Planning Board and City Council would consider and adopt the Park Street Code with a series of potential amendments to reduce the environmental impact of future development.

Ability to Meet Project Objectives:

The Environmentally Superior Alternative could meet many of the Project Objectives described in Chapter 2 Project Description. The objectives are listed below:

- To update the zoning code for the plan area to conform with General Plan objectives, goals, and policies.

An amended “environmentally superior” North Park Street Code could achieve this objective provided that the changes to the Code to reduce environmental impacts (a General Plan Objective) does not overly restrict or inhibit the community from achieving other General Plan objectives such as objectives to facilitate the redevelopment of the area or to support and encourage a range of new services and businesses that are not currently available in Alameda (also General Plan objectives).

- Adopt Zoning Ordinance amendments, standards and requirements to guide future development consistent with the community’s vision as articulated by the General Plan and Gateway Strategic Plan.

An amended “environmentally superior” North Park Street Code could achieve this objective. As with the prior objective, a balance would need to be struck between the environmental benefits that might be achieved by the changes to the Code and the effect of those changes on the ability of property owners and new businesses to comply with those new requirements or standards. If the standards are set too high and redevelopment of the area does not occur as a result, then the environmentally superior alternative might not achieve this objective as well as the North Park Street Code.

- Manage the redevelopment of private sites to create an active, pedestrian-friendly, transit-oriented mixed-use environment.

This objective could be achieved under the environmentally superior alternative provided that the changes to the Code for the environmentally superior alternative does not result in a condition where existing conditions are maintained because the standards and requirements on new development are prohibitive to financially viable redevelopment.

- Provide certainty for the community, property owners and future investors in the area by providing clear, form based regulations for the plan area.

This objective could be achieved under the environmentally superior alternative.

- Encourage economically viable redevelopment that is sensitive to existing neighborhoods and the historic character of the area.

This objective may not be achieved as well under the environmentally superior alternative if the changes to the Code make redevelopment and reinvestment in the area financially infeasible.

Ability to Reduce Environmental Impacts

Less Than Significant Impacts:

As described in Chapter 4, the North Park Street Code would not result in any significant impacts in the following environmental areas:

- Land use
- Population, employment, and housing
- Municipal Services and Open Space

The Environmentally Superior alternative would have similar less than significant impacts.

Significant Impacts Requiring Mitigation: As described in Chapter 4, the North Park Street Code does require mitigation to maintain a less than significant impact in the areas of:

- Utilities,
- Biology,
- Cultural Resources,
- Noise,
- Geology,
- Hydrology, and
- Hazardous materials.

The potential for impacts in these environmental areas would also occur with the Environmentally Superior Alternative. As described in Chapter 4, the potential impacts in these areas are impacts that might occur as the result of discovering unknown resources during construction (bats, archeological resources) or as the result of inadequate precautions against known hazards (noise from traffic, seismic hazards, or hazardous materials), or as the result of project specific characteristics that would need to be addressed in the project review process (waste water capacity). Provided that the Planning Board and City Council adopt the recommended mitigation measures described in Chapter 4 when they adopt the Environmentally Superior Alternative, the environmental impacts in these areas would be similar to the North Park Street Code.

Significant Unavoidable Impacts: As described in Chapter 4, the North Park Street Code does result in significant, unavoidable impacts even with mitigation in the following areas:

- Transportation and Circulation, and
- Greenhouse Gas and Air Quality.

The Environmentally Superior Alternative could include requirements and standards to further reduce the impacts in these areas. Specifically, changes to the North Park Street Code to reduce environmental impacts in these areas could include:

Transportation Impacts: The City of Alameda Transportation Element and Local Climate Action Plan identifies a number of initiatives to that could be implemented to decrease automobile trips citywide. These initiatives could be considered as possible amendments to the North Park Street Code to create an “environmentally superior” code. They include:

- Requiring that all new major developments’ short and long-term transportation emissions be reduced by 10 percent. Examples of strategies to achieve this reduction include transportation demand management strategies and implementation of a Bike Plan, or bicycle facilities.
- Providing transit and shuttles with signal priority lanes and queue jumpers to make transit a more attractive alternative to the automobile.
- Encouraging Alameda employers to provide opportunities for “flex hours,” compressed workweek and telecommuting schedules to reduce vehicle miles traveled, and reintroduce transportation reduction programs.
- Expanding the geographic area of the Work/Live ordinance to provide greater opportunities for reduced work-related commutes.
- Encouraging alternative fuel “Car Share” programs.

The Environmentally Superior Alternative might require that all development in the area achieve a predetermined trip reduction goal, such as a 10% reduction for development. To achieve these goals, all new development might be required to contribute to an area-wide shuttle system that provides direct service to Fruitvale or Lake Merritt BART Stations. Alternatively, the Environmentally Superior Alternative might require that all future developments be required to purchase AC Transit passes for all employees and residents. In addition, the Code could be amended to require that a every project provide additional bicycle facilities to encourage non-automobile trips, or the code could be amended to further reduce or eliminate off-street parking requirements to discourage the use of the automobile.

The City has imposed similar requirements on large-scale projects elsewhere in the City, but to impose these types of requirements in the North Park Street area would require that a number of difficult policy issues be addressed. The first issue to be addressed would be whether the requirement should apply to all properties in the area, even single family home properties, or whether the requirement should apply only to larger properties. A threshold for “large” would need to be established, which would determine which projects would be subject to the higher standards and requirements. The second issue to be addressed is whether the requirement should be imposed on all existing properties or just on new development proposals. A requirement that all property owners contribute to a transit fund could be expected to result in a significant increase in funds available to provide transit and a corresponding significant increase in transit use in the area. However, a district wide requirement would require establishment of an assessment district with the support of 51% of the existing property owners, which might be difficult to achieve. If the requirement is imposed only on new development and only on “large” projects, establishment of a district would not be necessary, but the environmental benefits of the “Environmentally Superior Alternative” over the Mitigated North Park Street Code would be only marginally better.

Greenhouse Gas Emissions and Air Quality Impacts.

As described in Chapter 4, the primary and most significant way to reduce greenhouse gas and air quality impacts is to reduce automobile trips. Over half (54%) of the City’s emissions are from transportation (cars, buses, and trucks). Changes to the North Park Street Code to reduce automobile trips are discussed above.

The second most significant way to reduce greenhouse gas emissions in Alameda is to reduce the amount of gases produced by commercial and residential buildings. Twenty nine percent (29%) of

Alameda’s green house gas emissions are from energy and heating demands of residential uses (homes) and 17 percent (17%) is from commercial uses (businesses). Under the “environmentally superior” North Park Street Code, new development could be required to exceed the standards required by the new California Building Code Green Building Standards to further reduce green house gas emissions. For example, the Code could establish a Green Point rating standard for new residential development and a LEED standard for new commercial development that would result in a less greenhouse gas emissions under the Environmentally Superior Alternative.

The City of Alameda Climate Action Plan recommends a citywide amendment to the Alameda Municipal Code to include sustainable design and green building standards for all new, substantially expanded, and remodeled buildings. Although an amendment to the North Park Street Code to increase sustainable building standards would be consistent with this recommendation, the Planning Board and City Council should consider whether a citywide requirement would not be preferable. From a environmental and economic development perspective, it may be preferable to establish these new standards citywide as opposed to area by area. To impose the more stringent requirements on the North Park Street area, but not the rest of the City would have less environmental benefit than a citywide amendment. From a citywide policy perspective, it may not be advisable to impose more restrictive or expensive requirements on one area of the City and require residents, businesses, and property owners in the North Park Street area to meet a higher standard than residents, businesses and property owners in the rest of the City.